

From: [Amanda Gallagher](#)
To: [Water Draft Permit Comment](#)
Cc: [Joshua Fluger](#)
Subject: ARR000000 Industrial Stormwater General Draft Permit Comments
Date: Thursday, July 19, 2018 4:00:44 PM
Attachments: [ARR000000 Draft Permit Comments 2018.pdf](#)

To Whom It May Concern:

GBMc & Associates has reviewed the Draft Industrial Stormwater General Permit ARR000000 and offers the attached comments.

Thanks,

Amanda Gallagher, P.E.
GBMc & Associates
219 Brown Lane
Bryant, AR 72022
Cell: 501-837-8999
Bryant Office: 501-847-7077



July 19, 2018

Jessica Temple, P.E.
General Permits Supervisor
Arkansas Department of Environmental Quality
Office of Water Quality - Permits Branch
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: 2018 Draft Industrial Storm Water General Permit (ARR000000) Comments

Dear Ms. Temple:

GBM^c & Associates has reviewed the above referenced draft permit and offers the following comment.

1. Part 1.5 provides the breakdown of industrial sectors. Per Part 8.33 viii (Definition for Storm Water Associated with Industrial Activity) transportation facilities with SIC Codes 40, 41, 42 (except 4221-4225), 43, 44, 45, and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations requires coverage for storm water associated with industrial activity.

The industrial sectors associated with the above SIC codes (P, Q, and S) do not clearly reflect that coverage is only required if a facility has specific industrial activities (maintenance shop, etc) onsite. We request that further clarification be added to Section 1.5.

2. Part 5.2.4 requires the completion of a Storm Water Annual Report (SWAR) each year and for this report to be retained on-site. The requirement to complete the SWAR and maintain with the SWPPP puts an undue burden on the permittee. The permit already requires extensive recordkeeping requirements. All of the information included in the SWAR is already being documented in other records already required by the permit. In lieu of requiring all facilities covered under the permit to complete the SWAR every year, we suggest the that facilities only be required to complete the SWAR per the Department's request.

This approach lessens the burden on all facilities and still allows ADEQ to audit permit compliance.

J. Temple
July 19, 2018
Page 2 of 2

We greatly appreciate the opportunity to present this comment and look forward to the resolution of these issues. If you have any questions, please do not hesitate to contact me or Josh Fluger at 501-847-7077.

Respectfully Submitted,
GBMC & ASSOCIATES

A handwritten signature in blue ink that reads "Amanda Gallagher". The signature is written in a cursive, flowing style.

Amanda Gallagher, P.E.
Environmental Engineer